

**UNITED STATES DISTRICT COURT**  
WESTERN DISTRICT OF TEXAS, DEL RIO DIVISION

United States of America

vs.

(1) Carlton Lee Verdon

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§  
§  
§  
§

CRIMINAL COMPLAINT

CASE NUMBER: DR:22-M -00144(1)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about **January 19, 2022** in **Dimmit** county, in the **WESTERN DISTRICT OF TEXAS** defendant(s) did, conspire with other unnamed co-conspirators, to transport, or move or attempt to transport or move, certain persons, knowing or in reckless disregard of the fact that that such persons were aliens illegally present in the United States, a felony,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(v)(I)

I further state that I am a(n) **Border Patrol Agent** and that this complaint is based on the following facts: *"On January 19, 2022, defendant Carlton Verdon was encountered driving a black 2020 Nissan Armada on FM 2644 near Carrizo Springs, Texas, within the Western District of Texas. A Border Patrol Agents stopped the vehicle for an immigration inspection which revealed the defendant was traveling with two passengers who were determined to be citizens of Guatemala and had admitted to illegally entering the United States. All*

**Continued on the attached sheet and made a part of hereof.**

Sworn to before me and subscribed in my presence,



Signature of Complainant  
Fuentes, Rubi  
Border Patrol Agent

01/21/2022

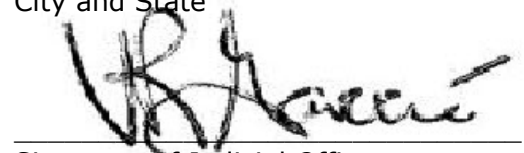
File Date

at DEL RIO, Texas

City and State

VICTOR ROBERTO GARCIA

UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

**WESTERN DISTRICT OF TEXAS**

UNITED STATES OF AMERICA

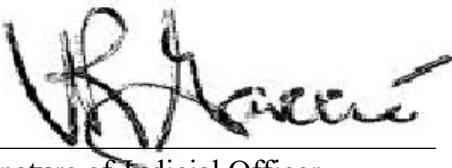
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**Continuation of Statement of Facts:**

occupants were transported to the station for processing and questioning. The defendant provided a sworn statement admitting to picking up the mother and daughter from a hotel in Eagle Pass, Texas and was going to be paid \$2,000 to bring them to San Antonio, Texas."



Signature of Judicial Officer



Signature of Complainant